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10 **THE UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 JAIME MARTORELL, an individual,

Case No.: 3:19-cv-00523-LRH-CLB

13
14 Plaintiff

15 v.

**STIPULATION TO EXTEND DEADLINE
TO COMPLETE DISCOVERY**

[Third Request]

16
17 DEBASHIS BAGCHI, an individual, and
JON BENGSTON, an individual,

18 Defendants.
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21 Plaintiff Jaime Martorell (“Plaintiff” or “Martorell”) and Defendants Debashis Bagchi and
22 Jon Bengston (“Defendants”) (collectively, at times, the “Parties”), by and through their respective
23 counsel, hereby stipulate and agree to extend the deadline for the close of discovery, currently
24 scheduled for September 11, 2020.

25 The parties have exchanged interrogatories and requests for production and replied to each
26 other’s requests. Counsel for Martorell and counsel for AirWire have each sent the other letters
27 outlining alleged deficiencies in the quality of responses supplied by the other. A meet and confer
28 telephonic conference was held to discuss concerns with each other’s Responses, and the parties

1 have continued to confer in writing. Should the parties be unable to fully resolve their concerns, any
 2 motion cycle to compel discovery would extend beyond the current deadline for the close of
 3 discovery of September 11, 2020. Additionally, the parties have come to an agreement on available
 4 dates in the month of September to conduct depositions. Accordingly, the parties have agreed to
 5 extend the deadline for discovery to November 16, 2020. This is the third request to extend the time
 6 for the close of discovery.

7
 8 DATED this 21st day of August 2020.

DATED this 21st day of August, 2020.

9 BY: /s/ Jeremy B. Clarke
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Attorneys for Defendants

19 **IT IS SO ORDERED.**

20 
 21 **UNITED STATES MAGISTRATE JUDGE**

22 DATED: August 28, 2020